

# *Arizona Consumers Council Foundation*

Jennifer L. Johnson, Secretary  
Board of Governors  
Federal Reserve System  
20<sup>th</sup> and Constitution Ave. N.W.  
Washington, DC 20551

BEST IMAGE AVAILABLE

Dear Ms. Johnson

Re: Docket No. R-1210

The Arizona Consumers Council Foundation strongly supports the proposed amendment to federal Regulation E which addresses payroll cards. The amendment would define a payroll card account directly or indirectly established by an employer to receive wages, salary, or other employee compensation on a recurring basis as an account which receives the consumer protections of the Federal Electronic Fund Transfer Act.

We ask the Federal Reserve Board to expand this proposal to clarify that Regulation E in addition, also applies to these types of cards:

Cards that deliver or hold funds that are important to consumers and families. Child support cards, unemployment cards, and cards delivering tax refunds or tax refund anticipation loan proceeds.

Cards that are marketed or used as substitutes for a bank account, particularly when these cards receive direct deposits of wages or other periodic payments, such as social security payments

In addition, we ask the Board to clarify that the creation of a subrule expressly covering payroll cards and, these other types of cards, does not restrict or impose new conditions on the general reach of what is a "consumer asset account." triggering coverage of the EFTA, under the general rules of Regulation E which will continue to apply to other products after the adoption of special inclusionary rules for certain types of cards.

We ask the Board to make the consumer protections of the EFTA more plainly applicable to payroll cards and to certain other types of stored value cards which are financially important to consumer households.

Thank you very much for your consideration of consumer needs.

Very truly yours,



Phyllis Rowe  
President

Address:  
P.O. Box 1288  
Phoenix, AZ 85001  
602-265-9625 voice  
602-263-7465 fax